

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DAVID FLEISHER, MICHAEL CLIME,	:	CIVIL NO. 2:12-CV-01326-JP
GARY IPPOLITO, ROBERT L.	:	
LIVINGSTON, DAVID TAILLON, on	:	
behalf of themselves and all others similarly	:	
situated,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
FIBER COMPOSITES, LLC,	:	
	:	
Defendant.	:	

**PLAINTIFFS' MOTION FOR AWARD OF ATTORNEYS' FEES, EXPENSES,
AND SERVICE AWARDS FOR CLASS REPRESENTATIVES**

Plaintiffs David Fleisher, Michael Clime, Gary Ippolito, Robert L. Livingston, and David Taillon (collectively “Plaintiffs”), on behalf of themselves and the Settlement Class, by and through their undersigned counsel and pursuant to Rules 23(h) and 54(d)(2) of the Federal Rules of Civil Procedure, hereby request that this Court order Defendant to pay the following: (1) Plaintiffs’ and Class Counsel’ attorneys’ fees in the amount of \$385,000 inclusive of all fees, costs, interest and expenses; and (2) a service award of \$2,500 to each of the following: David Fleisher, Michael Clime, Gary Ippolito, Robert L. Livingston, and David Taillon. In support of this Motion, Plaintiffs respectfully submit the accompanying Memorandum of Law and Exhibits thereto, including the Declaration of Charles J. Kocher.

WHEREFORE, Plaintiffs respectfully request that this Court grant this Motion and enter the proposed Order.

DATE: October 22, 2013

Respectfully submitted,
/s/ Charles J. Kocher
Simon B. Paris

Patrick Howard (PA Atty. I.D. No. 88572)
Charles J. Kocher (PA Atty. I.D. No. 93141)
SALTZ, MONGELUZZI, BARRETT
& BENDESKY, P.C.
1650 Market Street, 52nd Floor
Philadelphia, PA 19103
Phone: (215) 496-8282
Fax: (215) 496-0999
E-mail: sparis@smbb.com
E-mail: phoward@smbb.com
E-mail: ckocher@smbb.com

Steve W. Berman
Anthony D. Shapiro
Robert F. Lopez
HAGENS BERMAN SOBOL SHAPIRO LLP
1918 Eighth Avenue, Suite 3300
Seattle, WA 98101
(206) 623-7292
steve@hbsslaw.com
tony@hbsslaw.com

**Attorneys for Plaintiffs and the Settlement
Class**